

26<sup>th</sup> July 2011

Dr. Robert Fendall  
Chair  
Osteopathy Board of Australia

Dear Dr. Fendall,

**Re: Registration Standard: Limited Registration for Postgraduate Training or Supervised Practice**

The Chiropractic & Osteopathic College of Australasia (COCA) welcomes the opportunity to comment on this proposed registration standard.

The College recognises the imperative of ensuring protection of the public, in its various forms, by the issuance of registration standards and guidelines. The College also recognises that this imperative extends to all persons who hold themselves out to be and or use the title of “osteopath” and who wish to engage in postgraduate training and or supervised practice.

In general the College wishes to congratulate the Osteopathy Board of Australia (OBA) on the formulation of this registration standard, however we believe that certain aspects of the standard require clarification and possible amendment.

**Scope of application**

The College believes that the Board should more clearly define, when and under what circumstances it is necessary to register an osteopath undertaking postgraduate training. Notwithstanding, issues related to persons holding themselves out to be an osteopath or the use of the title “Osteopath”, COCA suggests that this registration standard should only apply to osteopaths undergoing postgraduate training, which involves clinical skills. In this context clinical skills would be broadly defined as any activity, clinical or otherwise, which when applied have the potential to cause harm or increased risk of harm to the public at large, including osteopaths or student osteopaths.

***Recommendation:***

***That this Registration Standard, be amended to only apply to osteopaths seeking registration, where their postgraduate training involves clinical skills which are defined as those skills used by an osteopath in practice, which have the potential to cause harm or increased risk of harm to the public at large, including osteopaths or student osteopaths.***

### **Requirements for initial registration**

While the College understands that the requirements for initial registration, appear uniform across all Boards and comply with the relevant sections of the National Law, in our view certain requirements, in certain cases, are unnecessary or overly restrictive.

The College agrees, in principle, with the requirement of confirmation, that an applicant seeking limited registration for postgraduate training or supervised practice, will meet the requirements of the Board's professional indemnity registration standard. However, with respect to limited registration for postgraduate training COCA suggests that this particular requirement should only apply to individuals whose training involves clinical skills. In this context clinical skills would be broadly defined as any activity, clinical or otherwise, which when applied have the potential to cause harm or increased risk of harm to the public at large, including osteopaths or student osteopaths.

In other circumstances, where the applicant seeks limited registration as osteopath for post graduate training but does not engage in activities that have a potential to cause harm or increased risk of harm to the public at large, then this requirement would appear unnecessary.

#### ***Recommendation:***

***That this Registration Standard, be amended to only apply to osteopaths seeking registration, where their postgraduate training involves clinical skills, which are defined as those skills used by an osteopath in practice, which have the potential to cause harm or increased risk of harm to the public at large, including osteopaths or student osteopaths.***

### **Requirements on limited registration for postgraduate training or supervised practice**

The College notes the Item numbering of the document appears to be incorrect in that Item 4 on page 9 of the document has been omitted.

Page 9 of the document also refers to “An osteopath registered under this category of ***limited registration in the public interest*** is not able to undertake independent private practice.” COCA assumes that this clause was intended to refer to “***limited registration for postgraduate training or supervised practice***”.

### **Guidelines for supervised practice**

COCA believes that is imperative that appropriate guidelines are put in place for this category of registration, in order to ensure that both the registrant and supervisor possess the desired qualities, experience and capacity for this training.

#### **Supervisor**

COCA suggests, that in addition to the requirements of a minimum of five years experience and current registration with no conditions or restrictions, that any osteopath entrusted with the task of supervised practice, should also be of good character. In this context the supervisor must be a “fit and proper” person for the supervision of a student osteopath. For example, it may not be in the best interest of the public for a student to be supervised by a practitioner, who has previously been found guilty of several breaches of the Act or Practice Standards, Codes or Guidelines, or similar offences in another jurisdiction, even though their registration status was unconditional at the time of their application.

**Recommendation:**

***That this Registration Standard, be amended to include a requirement that the supervisor should be of good character and in the opinion of the Board a "fit and proper person" for the purposes of student supervision.***

We hope, as part in this consultation process, you find our comments helpful in your deliberations.

Yours sincerely,

A handwritten signature in black ink, appearing to read "John W Reggars". The signature is written in a cursive style with a large, sweeping flourish at the end.

John W Reggars DC, MChiroSc.  
Vice President